



"Preserving Our Past, Enriching Our Present, Building Our Future"

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October 1, 2007

California Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
Attn: Diana Messina

RE: City of Jackson WWTP Tentative Order – NPDES NO. CA0079391

A major concern of the City is the current Tentative Order language for section III.E which reads:

"E. Five years following the adoption date of this Order, the Discharger is prohibited from discharging effluent into Jackson Creek when the receiving water flow does not provide a minimum of 20.1 dilution of the Facility's final effluent."

Under California Water Code Section 1211, the City cannot comply with the foregoing requirement without the approval of the Divisions of Water Rights. That approval is beyond City control and is not a foregone conclusion based on the City's work on this matter over the past several years. Therefore, as written, Section III.E may require the City to break the law to comply with guidance provided by the Department of Public Health. The law has primacy over guidance; therefore, the City believes Section III.E needs conditional language as follows:

Five years following the adoption date of this Order, the Discharger is prohibited from discharging effluent into Jackson Creek in amounts that exceed 1 part in 20 (i.e., 5 percent) of the resulting downstream average daily flow of Jackson Creek, unless the Discharger has demonstrated to the satisfaction of the Regional Water Board that limiting the effluent discharge in this manner is feasible."

The City is in support of the DPH position on this matter, but only to the extent that it does not require the City to break the law.

The Tentative Order is vague regarding what is meant by tertiary treatment, or equivalent. Does tertiary treatment, or equivalent, mean coagulated and filtered secondary effluent that meets the numerical water quality standards listed in Title 22 for disinfected tertiary recycled water, or does it mean these water quality standards plus all of the physical plant features described in title 22?

The City believes it can provide a coagulated and filtered, secondary effluent disinfected to a 7-day media total coliform concentration of 2.2 MPN/100ML for effluent

flows up to 2.0 Mgal/d. The City facilities do not have the physical plant features described in Title 22, and these features will be expensive to add (probably several million dollars).

Besides the City's facility not having all of the physical plant features described in Title 22, the current filters can handle only 2.0 Mgal/d whereas current effluent flows have been as high as 3.0 Mgal/d as a result of I/I which also causes large flows (and high dilutions) in Jackson Creek. The current Order reflects these two levels of treatment. The Tentative Order does not, which will require additional filters if the current high effluent flow and high stream flow effluent limitations are not included in the Tentative Order. Under conditions when effluent flows exceed 2.0 Mgal/d, the effluent should receive substantial dilution in Jackson Creek such that tertiary treatment, or equivalent, is not needed for protection of public health and the environment. Adding filter cells and the ancillary facilities is also an expensive undertaking by the City.

Thank you for the opportunity to submit the attached comment and work with the Regional Board on the final NPDES permit requirements for the City of Jackson. We are hopeful that the upcoming meeting on Friday, October 5, provides some valuable input from all of the stakeholders involved in our discharge issues.

Sincerely,



Michael Daly, City Manager

/attachment

cc: City Council

COMMENTS ON
CITY OF JACKSON WASTEWATER TREATMENT PLANT
TENTATIVE ORDER No. R5-2007-XXX
NPDES No. CA0079391

LIMITATIONS AND DISCHARGE REQUIREMENTS

Page 1, A. Background, 2nd sentence:

“ . . . The Discharger submitted a Report of Waste Discharge, dated 7 December 2004, and applied for a NPDES permit renewal to discharge up to 0.71 mgd of treated wastewater from their Wastewater Treatment Plant, hereinafter Facility. The application was deemed complete on **16 January 2006.**”

Change to:

The Discharger submitted a Report of Waste Discharge, dated 7 December 2004, and applied for a NPDES permit renewal to discharge up to 0.71 mgd (ADWF basis) of treated wastewater from their Wastewater Treatment Plant, hereinafter Facility. Effluent discharge rates are substantially greater than 0.71 mgd during flowing wet weather as a result of inflow and infiltration (I/I) of rain water and groundwater into the collection system.

Page 1, B. Facility Description:

“**B. Facility Description.** The Discharger owns and operates a wastewater treatment plant. . . .”

Insert after first sentence::

The facility is designed to provide filtered, disinfected, secondary treatment to wastewater flows up to 2.0 mgd. The facility is also designed to provide disinfected, secondary treatment of flows greater than 2.0 mgd up to peak flows of about 3.0 mgd.

Page 2, G. Water Quality-based Effluent Limitations, 1st paragraph, last sentence.:

“ . . . The rationale for these requirements, which consist of tertiary treatment or equivalent requirements, is discussed in the Fact Sheet.

Question:

“tertiary treatment or equivalent requirements” - advanced secondary?

Page 7, P. Monitoring and Reporting, 2nd sentence.:

“P. Monitoring and Reporting. Section 122.48 requires that all NPDES permits specify requirements for recording and reporting monitoring results. Water Code sections 13267 and 13383 authorizes the Regional Water Board to require technical and monitoring reports.

Change:

The word *authorizes* should be *authorize*.

Page 9, E.:

“E. Five years following the adoption date of this Order, the Discharger is prohibited from discharging into Jackson Creek when the receiving water flow does not provide a minimum of 20:1 dilution of the Facility’s final effluent.”

Change to:

Five years following the adoption date of this Order, the Discharger is prohibited from discharging effluent into Jackson Creek in amounts that exceed 1 part in 20 (i.e., 5 percent) of the resulting downstream average daily flow of Jackson Creek.

OR, Alternative Language for E:

Same as modified above plus “unless the Discharger has demonstrated to the satisfaction of the Regional Water Board that limiting the effluent discharge in this manner is feasible.”

Note: Without this conditional clause, Orders III.E and VI.A.2.u may be in contradiction of each other.

Page 10, Table 6. Effluent Limitations:

Comment:

- 1) Round effluent limits to 2-place accuracy per SIP.
- 2) Note 1: Change to: Applicable only during the average dry weather flow period of each year (see Sections VII. E. and F.) and a flow of 0.71 mgd.

Page 11, c. and d:

Comment:

These are OK, but would prefer “dissolved”.

Page 11, f. and g:

Comment:

Wrong effluent pH values were used to calculate limits.

Page 11, k:

Change to:

The average dry weather effluent flow (ADWF) as defined in Section VII.E shall not exceed 0.71 mgd.

Page 11, l:

Change to:

The monthly average total recoverable mercury loading in the effluent shall not exceed 0.0016 lbs/month more than the amount of mercury removed from the environment via the potable water supply intake.

Comment:

We will request intake credits.

Page 11, m:

Comments:

- 1) The 426 μ mhos/cm should be rounded to 2-place accuracy.
- 2) The City objects based on increased water conservation mandate of the State.

Page 12, Table 7. Interim Effluent Limitations:

Comments:

- 1) Round to 2-place accuracy per SIP.

Page 16, 15.:

Comment:

Not likely to be able to comply in cold, dry winters. Suggest review of Lincoln permit for a model and precedent.

Page 18, 2.b., Last sentence:

"The Regional Water Board may review and revise this Order at any time upon application of any affected person or the Regional Water Board's own motion."

Change to:

The Regional Water Board may review and revise this Order at any time upon application of the Discharger, any affected person, or the Regional Water Board's own motion."

Page 21, First paragraph:

"31 January. . ."

Change to:

1 February, and make it part of the Annual Report.

Page 22, C.1.b.ii.:

Change to:

When new information, that was not available at the time of permit issuance, would have justified different permit conditions at the time of issuance. Specific new information that the Discharger has proposed to investigate as a means to achieve compliance that may affect certain effluent limitations include a mixing zone and dilution study, and water effect ratio studies.

Page 23, g., last sentence:

Change to:

Based on a review of the findings of this study, this Order may be reopened for addition and or modification of effluent limitations, prohibitions, and/or other requirements.

Page 24, i.a):

Change to:

- a) A description of the investigation and evaluation techniques that will be used to identify potential causes and sources of effluent toxicity, effluent variability, treatment system efficiency, and bioassay test result variability;

Page 24, i.c):

Change to:

- c) A discussion of who will conduct the Toxicity Reduction Evaluation, if necessary (i.e., an in-house expert or outside contractor).

Page 25, c) Paragraph after 3):

" . . . the Discharger shall submit to the Regional Water Board a TRE Work Plan
for approval by the Executive Officer.

Change to:

. . . the Discharger shall submit to the Regional Water Board an event-specific TRE Work Plan for approval by the Executive Officer.

ALSO:

" . . . The TRE Work Plan must be developed in accordance with USEPA guidance."

. . . This event-specific TRE Work Plan must be developed in accordance with USEPA guidance.

Page 28, 6. Other Special Provisions, a.:

“a. Wastewater shall be oxidized, coagulated, filtered, and adequately disinfected pursuant to the Department of Public Health (DPH) reclamation criteria, California Code of Regulations, Title 22, Division 4, Chapter 3, (Title 22), or equivalent.”

Comment:

By referring to “Chapter 3”, in its entirety, this denotes the requirement for all monitoring, alarms, redundancy features. The term “or equivalent” is not common to the industry and does not specify specific relaxation of the T22 requirement if not reclaimed, but discharged.

Page 29, 1st Paragraph, last sentence:

“ . . . As these compliance schedules are greater than 1 year, the Discharger shall submit semiannual progress reports in accordance with the Monitoring and Reporting Program (Attachment E, Section X.D.1.)

Change to:

As these compliance schedules are greater than 1 year, the Discharger shall submit progress reports in accordance with the Monitoring and Reporting Program (Attachment E, Section X.D.1.)

Comment:

See Response regarding Attachment E, MRP, Page E-14, 4. Annual Operations Report.

Page 29, c. Compliance Schedule to Ensure Compliance with Prohibition to Discharge to Jackson Creek When Receiving Water Flows Do Not Provide a Minimum of 20:1 Dilution., first sentence:

“ . . . The Discharger shall evaluate and implement alternative wastewater handling and disposal methods that will ensure compliance with Discharge Prohibition III.E of this Order, which prohibits the discharge of wastewater into Jackson Creek when a minimum of 20:1 receiving water to effluent dilution is not available.

Change to:

The Discharger shall evaluate and implement, if feasible, alternative wastewater handling and disposal methods that will ensure compliance with Discharge Prohibition III.E of this Order, which conditionally prohibits the discharge of effluent into Jackson Creek in amounts exceeding 5 percent of the resulting downstream creek flow.

Page 30, VII.B:

“ Compliance with effluent limitations <subsection> . . . collected over a monthly period as a percentage of the arithmetic mean of the values for influent samples collected at approximately the same times during the same period.”

Change to:

Compliance with the final effluent limitations Section IV.A.1.b . . . collected over a calendar monthly period as a percentage of the arithmetic mean of the values for influent samples collected at approximately the same times during the same period.

Page 30, VII.F:

“F. Mass Effluent Limitations. Compliance with the mass effluent limitations will be determined during average dry weather periods only when groundwater is at or near normal and runoff is not occurring.”

Change to:

F. Mass Effluent Limitations (IV.A.1.a). Compliance with the mass effluent limitations will be determined only during average dry weather periods when groundwater is at or near normal and runoff is not occurring. Mass effluent limitations do not apply outside of the average dry weather period of three months.

ATTACHMENT E - MRP**Page E-2, II. Monitoring Locations, Table E-1. Monitoring Station Locations.***Change:*

Add row above BIO-001 as follows:

---	SPL-002	A location where a representative sample of the surface water removed for potable water use can be obtained.
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Page E-3, IV.A.1., Table E-3. Effluent Monitoring.*Comments:*

- 1) Parameters: pH, Ammonia Total (as N), Temperature: The Minimum Sampling Frequency of 1/Day seems excessive, process does not change that much from day to day. Suggest 2/week.

Page E-4, IV.A.1., Table E-3. Effluent Monitoring (Continued).*Comments:*

- 1) Parameter Total Dissolved Solids should read Total Dissolved Fixed Solids.
- 2) Note 4: Change to:

Calculated using the following equation and only during the average dry weather flow period of each calendar year, see Sections VII.E and F.

- 3) Note 11: Change to:

Total residual chlorine must be monitored with a method sensitive to and accurate at the permitted level of 0.01 mg/L. A continuous monitoring analyzer for dechlorination agent residual is an acceptable alternative, see Section VII.H.

Page E-5, B.2. Sample Types:

"2. *Sample Types* – . . . The effluent samples shall be taken at the effluent monitoring location specified in the Monitoring and Reporting Program. The receiving water control shall be a grab sample obtained from the RSW-001 sampling location, as identified in the Monitoring and Reporting Program."

Change to:

. . . The effluent samples shall be taken at effluent monitoring location EFF-001. The receiving water control shall be a grab sample obtained from the RSW-001 sampling location.

Page E-8, VIII.A.1, Table E-5:*Change:*

Parameter Radionuclides units should be PCi/L

Comment:

Parameter Total Residual Chlorine: Not needed if we have continuous effluent monitor. Suggest 1/year with radionuclides.

Page E-9, IX.A.1, Table E-6:*Change:*

Parameter Total Dissolved Solids should be Total Dissolved Fixed Solids.

Page E-9, IX.B.1.:*Insert after Table E-6:*

2. Monitoring Location SPL-002

The Discharger shall Monitor the Municipal Raw Water Supply at SPL-002 as follows. A sampling station shall be established where a representative sample of the raw water can be obtained. Raw water supply samples shall be collected at approximately the same time as the effluent samples.

Table E-7 Municipal Raw Water Supply Monitoring Requirements

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Mercury, Total Recoverable	µg/L	Grab	1/Quarter	(1)
	lbs/month	Calculate	1/Quarter	
Flow (2)	mgd	Meter	Continuous	(1)

(1) As required by 40 CFR Part 136.

(2) That portion of the total water intake serving the needs of the City of Jackson.

Page E-12, Table E-7:

Change to: Table E-8.

Page E-14, Table E-8:

Change to: Table E-9.

Page E-14, 4. Annual Operations Report:*Change:*

Change 30 January to 1 February and make it Part of the Annual Report.

ATTACHMENT F - FACT SHEET

Page F-4, Table F-1. Facility Information:

Change Facility Design Flow to: 2.0 mgd with filters, 3.0 mgd without filters

Page F-5, II. Facility Description, first paragraph:

“... The Facility design flow capacity is 0.71 mgd. Information collected during a site visit on 25 August 2006 indicated an average daily flow of approximately 0.63 mgd at the facility, with an average dry weather flow of approximately 0.55 mgd. ...”

Change:

... The Facility rated capacity is 0.71 mgd, ADWF. Its actual treatment capacity is 2.0 mgd with filters and 3.0 mgd for all processes other than the filters. ...

ALSO:

“...the Facility representative stated that the Facility is capable of meeting Title 22 tertiary effluent with current facilities plus minor upgrades to achieve the necessary redundancy and reliability of treatment.”

Comment:

... the Facility is capable of meeting “equivalent” Title 22 tertiary effluent with current facilities, however, upgrades are required to achieve the necessary redundancy and reliability of treatment for reuse.

Page F-6, 3rd paragraph:

“Two letters from DPH, dated 13 July 2007 and 12 June 2003, signed by Joseph Spano, PE, District Engineer, Drinking Water Field Operations Branch of the Stockton Branch, suggests that DPH is concerned with the site-specific impact of the City of Jackson discharge may have on the beneficial use of the surface water as a domestic water supply source, particularly when the flow in Jackson Creek does not provide 20:1 dilution. The 13 July 2007 DPH letter recommends Title 22 tertiary treatment of the wastewater plus a 20:1 dilution ratio (creek-to-discharge flow) to address a downstream trailer residential park and recreational area in which the residents use Jackson Creek water for drinking water purposes. In addition to water quality needed to protect human health, the DPH letters address perception of providing residents relatively undiluted treatment plant effluent as a domestic drinking water source. The recommendation in the letters specified above are site-specific recommendations, not DPH department policy.”

Change:

. . . Drinking Water Field Operations Branch that the Stockton Branch, . . . to address a downstream trailer residential park and recreational area in which the residents use Jackson creek water from Lake Amador . . .

Page F-7, first paragraph:

"DFG based this assessment on the contributed flow to the creek, and not from a public health perspective."

Comment:

The Fact sheet should state that it is unlawful for the Discharger to reduce its discharge to Jackson Creek without the approval of the State Board's Division of Water Rights.

Page F-7, B.2:

Change:

Add the word "Lake" to "Lake Amador".

Page F-7, Table F-2:

Change:

For Parameter Discharge Flow, change units from MCD to mgd.

Page F-9, 3rd paragraph:

"This Order contains effluent limitations requiring a tertiary level of treatment, or equivalent, which is necessary to protect the beneficial uses of the receiving water. The Regional Water Board has considered the factors listed in CWC section 13241 in establishing these requirements, as discussed in more detail in the Fact Sheet, Attachment F, section IV.B. "

Change:

This Order contains effluent limitations requiring a level of treatment which is necessary to protect the beneficial uses of the receiving water. . .

Page F-10, second paragraph:

Change:

Change EPCRA to EPCRA.

Page F-13, second paragraph:

"2. . . Discharge Prohibition III.E prohibits the discharge of wastewater by the Discharger to Jackson Creek, five (5) years following the adoption date of the Order, when a minimum dilution of 20:1 is not provided by the receiving water."

Change:

... Discharge Prohibition II.E conditionally prohibits the discharge of wastewater by the Discharger to Jackson creek, five (5) years following the adoption date of the Order, when a minimum dilution of 20:1 is not provided by the receiving water.

Comment on this change:

The conditional nature of the prohibition is necessary because the Discharger may not be able to comply with the DPH recommended prohibition and comply with CWC Section 1211. Compliance with State law supercedes compliance with recommendations if no means to comply with both is practicable.

Page F-14, b. pH:

Comment:

Page 10 of the Order state to be no lower than 7.5. The City will provide acid addition if necessary.

Page F-14, d. Flow:

"d. **Flow.** The Facility is designed to provide a tertiary level of treatment for up to a design flow of 0.71 mgd. Therefore, this Order contains an average dry weather flow effluent limit of 0.71 mgd."

Change to:

d. Flow. The Facility is rated by the Discharger to provide a tertiary level of treatment for a flow of 0.71 mgd under dry weather flow conditions. The actual design flow is 2.0 mgd.

Page F-15, continuation of Table F-3:

Change:

1) Instantaneous Minimum should be 6.5, and Instantaneous Maximum should be 7.5, see Page 10 of the Limitations and Discharge Requirements Section.

2) Note 2:

Mass based effluent limitations are established for the average dry weather flow period using the following formula: ...

Page F-15, 2.b. Discharge Conditions:

"b. **Discharge Conditions.** This Order includes a compliance schedule of 5 years, after which, the Discharger shall be prohibited from discharging to Jackson Creek when a 20:1 dilution of the effluent in the receiving water for all discharges to Jackson Creek is not available. This prohibition has been established for

protection of downstream domestic beneficial water supply uses in accordance with DPH site-specific guidance for this facility's discharge and impacts on existing downstream water user. In the interim period, the Discharger is permitted to discharge Title 22-quality effluent to the receiving water regardless of flow ratio. Current flow data indicate that, at times, Jackson Creek is dominated by effluent water downstream of the discharge. The criteria for constituents such as metals and ammonia that are dependent on pH, temperature, and hardness under this year-round discharge condition were calculated using effluent data. At the end of the compliance schedule, when the Discharger is prohibited from discharging to Jackson Creek at less than 20:1 dilution of the effluent, mixing of the effluent with the receiving water will occur and downstream receiving water will not be dominated by the effluent. Under this conditions, the most protective criteria for pH, temperature, and hardness"

Changes:

b. Discharge conditions. This Order includes a compliance schedule of 5 years, after which, the Discharger shall be prohibited, conditionally, from discharging effluent to Jackson Creek in amounts exceeding a 20:1 dilution in the receiving water. This conditional prohibition . . . impacts on existing downstream water users. . . . At the end of the compliance schedule, when the Discharger is prohibited, conditionally, from . . .

Page F-16, first paragraph:

" . . . be granted for the calculation of effluent limitations."

Change:

. . . be considered or granted for the calculation of effluent limitations until such time that the Discharger submits a mixing zone and dilution study.

Page F-16, c. 4th paragraph:

" . . . after which the Discharger is prohibited from discharging to Jackson Creek when 20:1 dilution within the receiving water for all discharges to Jackson Creek is not available. . . "

Change:

. . . after which the Discharger is prohibited conditionally . . .

Page F-17, d.

Comment:

For all criteria other than aquatic life, the long-term dilution is used and therefore a mixing zone and dilution study are not needed. But, Discharger does have to provide an estimate of :

$$\frac{\text{Jackson Creek harmonic mean flow}}{\text{Long - term permitted effluent flow}}$$

Page F-20, last paragraph.

Comment:

The maximum permitted effluent pH is stated as 7.5 on Page 10 of the Limitations and Discharge Requirements.

Page F-21, 1st paragraph.

Comment:

The maximum permitted effluent pH is stated as 7.5 on Page 10 of the Limitations and Discharge Requirements, the 2.14 mg/L (as N) amount needs to be revised.

Page F-21, 2nd paragraph.

Comment:

- 1) Use a 30-day average pH, just like temperature?
- 2) Regarding the resulting 30-day CCC: with dilution you need a lower NH₃ limit, therefore, no dilution is not a “worst-case” condition.

Page F-23, h., last paragraph.

Comment:

The MDEL for total copper of is 6.7 µg/L on Page 10 of the Limitations and Discharge Requirements.

Page F-29, 2nd paragraph.

Comment:

$$\text{MEC} = 60 < \text{WQO} = 300$$

How is that reasonable potential to do anything other than to reduce the potential for an exceedance?

Page F-29, 0. Manganese, paragraph 2.

“ . . . Therefore, the discharge has a reasonable potential to cause or contribute to an in-stream excursion above the Secondary MCL for manganese. The receiving water has exceeded the Secondary MCL for manganese. . . . ”

Change to:

... Therefore, the discharge has a reasonable potential to cause or contribute to an in-stream excursion above the Secondary MCL for manganese. the receiving water has been at the Secondary MCL for manganese at times. ...

Page F-30, 2nd paragraph:

“...and have impacts on beneficial uses in the Sacramento San Joaquin Delta.

Thus, the discharge of mercury to the surface waters in the Central Valley draining into the Delta is being limited.”

Change:

... and have impacts on beneficial uses in the Sacramento San Joaquin Delta. However, the Discharger's potable water supply removes water and associated mercury from the watershed flowing to the Delta. Thus, the incremental increase in mercury discharged to the surface waters in the Central Valley draining into the Delta over and above the mercury removed from the watershed draining into the Delta by the potable water supply intake is being limited.

Page F-30, 3rd paragraph:

“This Order contains a performance-based mass effluent limitation of 0.0016 lbs/month for mercury for the effluent discharged to the receiving water. This limitation ...”

Change:

This Order contains a performance-based mass effluent limitation of 0.0016 lbs/month for mercury above the mercury mass removed by the potable surface water supply intake (i.e., the intake credit). This ...

Page F-32, 1st paragraph:

“treated to a level equivalent to that recommended by DPH. In addition to coliform testing, a turbidity effluent limitation has been included as a second indicator of the effectiveness of the treatment process and to assure compliance with the required level of treatment. The previous Order included effluent limitations of 2 NTU as a monthly average and 5 NTU as a daily maximum. However, a tertiary treatment process, or equivalent, must be capable of reliably meeting a turbidity limitation of 2 nephelometric turbidity units (NTU) as a daily average, 5 NTU no more than 5% of the time in a 24-hour period, and 10 NTU at any time. This Order includes the more stringent effluent limitations for turbidity to ensure compliance with Title 22 requirements. Failure of the filtration system such that virus removal is impaired would normally result in increased particles in the effluent, which result in higher effluent turbidity. Turbidity has a major advantage for monitoring filter performance, allowing immediate detection of filter failure and rapid corrective action. Coliform testing, by comparison, is not conducted continuously and requires several hours, to days, to identify high coliform

concentrations. Therefore, to ensure compliance with the DPH recommended Title 22 disinfection criteria, weekly average effluent limitations are impracticable for turbidity."

Change:

treated to a level equivalent to that recommended by DPH, but without the higher monitoring, alarms and redundancy required when reclaimed.

Comment:

ONLY if the State of California accepts the current City treatment facilities as producing a T22, tertiary equivalent effluent can the City accept the language that refers to "equivalent" treatment.

Page F-32, ii:

"ii. The environmental characteristics of the hydrographic unit, including the quality of the available water, will be improved by the requirement to provide tertiary treatment for this wastewater discharge. Tertiary treatment will allow for the reuse of the undiluted wastewater for food crop irrigation and contact recreation activities that would otherwise be unsafe according to recommendations from the DPH."

Change:

. . . to provide equivalent tertiary treatment for this wastewater discharge.

Comment:

“Equivalent tertiary treatment” will not allow reuse. ONLY if the State of California accepts the current City treatment facilities as producing a T22, tertiary equivalent effluent can the City accept the language that refers to “equivalent” treatment.

Page F-35, v. Salinity Effluent Limitations, 2nd paragraph:

“ . . . Based on the sample results for the effluent, it appears the Discharger can meet these new limitations.”

Change:

Based on the sample results for the effluent, it appears the Discharger can meet these new limitations as long as neither the Discharger nor the potable water supplier implement any further water conservation measures that will naturally increase the salinity of the Discharger’s influent wastewater and effluent.

Page F-35, v. Salinity Effluent Limitations, 3rd paragraph:

“ . . . Also water supply monitoring is required to evaluate the relative contribution of salinity from the source water to the effluent.”

Change:

. . . Also water supply monitoring is required to evaluate the relative contribution of salinity from the source water to the effluent, and from water conservation measures.

Page F-36, 2nd paragraph:

The MEC for silver was 1.2 µg/L, based on four samples collected between 30 January 2002 and 14 November 2002, while the maximum observed upstream receiving water silver concentration was non-detect (<0.02 µg/L), based on four samples collected between 30 January 2002 and 14 November 2002. The discharge has a reasonable potential to cause or contribute to an in-stream excursion above the CTR criteria for silver for the period until the Discharger attains 20:1 dilution. An AMEL and MDEL for silver of 0.49 µg/L and 0.99 µg/L, respectively, are included in this Order based on CTR criteria for the protection of freshwater aquatic life (see Attachment F, Table F-15

for WQBEL calculations). Although silver does not demonstrate reasonable potential when the discharge receives 20:1, these effluent limitations are established in this Order under both discharge conditions in order to prevent backsliding.

Comment:

We cannot find this silver limit on Page 10 or 11 of the Limitations and Discharge Requirements.

Page F-40, 2nd paragraph:

“An AMEL and MDEL for zinc of 30 µg/L and 60 µg/L, respectively, are included . . .”

Change:

An AMEL and MDEL for zinc of 31 µg/L and 62 µg/L, respectively, are included in . . .

Comment:

See Page 10 of the Limitations and Discharge Requirements Section.

Page F-43, Table F-6. WQBEL Calculations for Ammonia (until all discharges receive 20:1 dilution):

Comments:

- 1) Parameter pH; Acute and Chronic (30-day) should be 7.5 according to Page 10 of the Limitations and Discharge Requirements.
- 2) For the Chronic (30-day) AMEL Multiplier (95th %) of 1.31, and the Chronic (30 day) MDEL Multiplier (99th %) of 4.68:

$$\frac{4.68}{1.31} \pm 2.01 \text{ Were different CV values used for these multipliers? These might be wrong.}$$

- 3) For the Human Health MDEL (mg/L) of 3.0:

$$3.0 < 4.2 \text{ governs.}$$

- 4) Note 2: Can't set an effluent limit based on the assumption that another effluent limit will be exceeded.

Page F-43, Table F-7. WQBEL Calculations for Ammonia (when all discharges receive 20:1 dilution):

Comments:

- 1) Parameter pH; Acute and Chronic (30-day) should be 7.5 according to Page 10 of the Limitations and Discharge Requirements.
- 2) For the MDEL (mg/L) for Chronic (30-day) and Human Health:
 - 3.0 governs but the multipliers may be wrong.
 - $\frac{4.68}{1.31} \pm 2.01$ Were different CV values used for these multipliers? These might be wrong.

- 3) Note 2: Can't set an effluent limit based on the assumption that another effluent limit will be exceeded.

Page F-44, Table F-8. WQBEL Calculations for Copper (under both discharge conditions):

Comments:

- 1) AMEL for Acute of 3.22 is 3.3 on Page 10 of the Limitations and Discharge Requirements.
- 2) MDEL for Acute of 6.46 is 6.7 on Page 10 of the Limitations and Discharge Requirements.

Page F-46, Table F-15. WQBEL Calculations for Silver (until all discharges receive 20:1 dilution):

Comments:

Don't see a limit on Page 10 or 11 of the Limitations and Discharge Requirements.

Page F-47, Table F-17. WQBEL Calculations for Zinc (under both discharge conditions):

Comments:

The AMEL for Acute of 30 and the MDEL for Acute of 60 are different from those on Page 10 of the Limitations and Discharge Requirements Section.

Page F-47, Table F-18. Summary of Water Quality-based Effluent Limitations (until all discharges receive 20:1 dilution):

Comments:

- 1) For Parameter Copper, Total Recoverable: See Page 10 of the Limitations and Discharge Requirements Section.
- 2) For Parameter 2,6-Dinitrotoluene, Maximum Daily: See Page F-45 and Page 10 of the Limitations and Discharge Requirements.
- 3) For Parameter pH, Instantaneous Maximum: Should be 7.5 per Page 10 of the Limitations and Discharge Requirements.

Page F-48, Continuation of Table F-18:

Comment:

See Page 10 of the Limitations and Discharge Requirements Section for Average Monthly and Maximum Daily.

Page F-48, Table F-19: Summary of Water Quality-based Effluent Limitations (when all discharges receive 20:1 dilution)

Comments:

- 1) Parameter Copper, Total Recoverable: See Page 10 of the Limitations and Discharge Requirements Section.

- 2) Parameter 2,6-Dinitrotoluene: See Page 10 of the Limitations and Discharge Requirements Section.
- 3) Parameter pH: Instantaneous Maximum should be 7.5.
- 4) Parameter Silver, Total Recoverable: Cannot find values on Page 10 or Page 11 of the Limitations and Discharge Requirements.
- 5) Parameter Zinc, Total Recoverable: See Page 10 of the Limitations and Discharge Requirements Section.

Page F-50, D.1., last paragraph:

“Mass-based effluent limitations were calculated based upon the permitted average daily discharge flow allowed in Section IV.A.1.g of the Limitations and Discharge Requirements.”

Comment:

- 1) “Daily discharge” needs to be changed to dry weather discharge.
- 2) Could not find reference in Section IV.A.1.g. - ? Is it k?

Page F-52, Table F-20. Summary of Final Effluent Limitations (when the discharge receives 20:1 dilution for all discharges)

Comments:

- 1) Parameter pH: Instantaneous Maximum of 7.5, see Page 10 of the Limitations and Discharge Requirements Section.
- 2) Parameter Copper, Total Recoverable: See Page 10 of the Limitations and Discharge Requirements Section.
- 3) Parameter Silver, Total Recoverable: See Page 10 of the Limitations and Discharge Requirements Section.
- 4) Parameter Zinc, Total Recoverable: See Page 10 of the Limitations and Discharge Requirements Section.

Page F-54, Table F-21. Summary of Final Effluent Limitations (until the discharge receives 20:1 dilution for all discharges)

Comments:

- 1) Parameter pH: Instantaneous Maximum of 7.5, see Page 10 of the Limitations and Discharge Requirements Section.
- 2) Parameter Copper, Total Recoverable: See Page 10 of the Limitations and Discharge Requirements Section.
- 3) Parameter Silver, Total Recoverable: See Page 10 of the Limitations and Discharge Requirements Section.
- 4) Parameter Zinc, Total Recoverable: See Page 10 of the Limitations and Discharge Requirements Section.

Page F-58, e. Dissolved Oxygen:

Comment:

Wrong citation cited.

Page F-59, o. Temperature:

Comment:

This should mention that averaging is allowed.

Page F-59/60, last paragraph, Turbidity :

Comment:

This should mention that averaging is allowed.

Page F-61, 4th paragraph:

Comment:

This seems excessive. Process doesn't change that much day to day.

Page F-63, 1st paragraph:

"from the source water to the effluent. In particular, annual monitoring for electrical conductivity, total dissolved solids and standard minerals is required."

Change:

and mercury from the source water to the effluent. In particular, annual monitoring for electrical conductivity, total dissolved solids and standard minerals is required. Monthly monitoring of the potable raw water supply is required.

Page F-71, e:

". . . Discharge Prohibition which prohibits the discharge of wastewater by the Discharger to Jackson Creek. . ."

Change:

. . . Discharge Prohibition which prohibits, conditionally, the discharge of wastewater by the Discharger to Jackson creek

Page G-2, Constituent Iron:

Comment:

Reasonable potential should be "No". See Comment for Page F-29, 2nd paragraph.